

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

UNITED STATES OF AMERICA,	)	
Plaintiff,	)	
	)	Case No. 4:19-cv-00415
v.	)	
	)	Filed Electronically
ALEXANDRU BITTNER,	)	
Defendant.	)	

**DEFENDANT ALEXANDRU BITTNER'S MOTION FOR LEAVE TO FILE HIS  
RESPONSE TO PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT**

Defendant, Alexandru Bittner, by his undersigned counsel, respectfully moves the Court for leave to file his response to Plaintiff's Motion for Partial Summary Judgment one day past the deadline and in support thereof, states:

1. On April 3, 2020 the Court granted the parties' joint motion to extend the deadlines to respond to the parties' respective motions for partial summary judgment (Doc. 44). Thus, under the extended deadlines, the parties' responses to the respective motions for summary judgment were due April 17, 2020.

2. At 12:30am on April 18, 2020, Defendant filed his Response to the United States' Motion for Partial Summary Judgment (Doc. 47), thirty minutes passed the April 17, 2020 deadline.

3. In accordance with San Antonio Mayor Ron Nirenberg's Stay Home, Work Safe Order, Defendant's counsel is working from home. It took longer than anticipated for the undersigned counsel to remotely organize, mark, and appropriately redact the exhibits for Defendant's Response.

WHEREFORE, Defendant respectfully requests the Court to grant this Motion.

Dated: April 18, 2020

Respectfully submitted,

CLARK HILL STRASBURGER

By: /s/ Rachael Rubenstein

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on April 18, 2020, a true and correct copy of the foregoing was electronically filed with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following:

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